

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

CIVIL ACTION NO.: 04-40113-FDS

ELIZABETH R. STEFFENBERG,	)	(Christine S. Collins BBO#639293)
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
T. GENE GILMAN, STEVEN GILMAN,	)	
THE GILMAN INSURANCE	)	
AGENCY, INC., DAVID M. SCOLL,	)	
ARBOR SECURITIES, LTD.,	)	
ALLIANCE INVESTMENT	)	
MANAGEMENT, COMMONWEALTH	)	
FINANCIAL HOLDINGS INC.,	)	
FINANCIAL LINKS, INC.,	)	
T. GILMAN & CO., LTD.,	)	
AVIVA LIFE INSURANCE COMPANY,	)	
TRADETEK, LTD., and	)	
TRADETEK, LLC,	)	
	)	
Defendants.	)	

**PLAINTIFF'S ASSENTED-TO MOTION TO EXTEND TIME TO OPPOSE  
DEFENDANT DAVID M. SCOLL'S DISCOVERY MOTIONS**

NOW COMES Plaintiff, Elizabeth R. Steffenberg ("Ms. Steffenberg"), and hereby moves, pursuant to Local Rule 7.1 of the Local Rules of the United States District Court for the District of Massachusetts ("Local Rules"), for an extension of time to September 15, 2005 within which to oppose Defendant, David M. Scoll's ("Mr. Scoll"), discovery motions filed on or about August 18, 2005.

In support hereof, Ms. Steffenberg states:

1. Mr. Scoll filed his Motion to Strike and Compel the Plaintiff's Answers to Second Set of Interrogatories and his Motion for an Order Compelling the Plaintiff (1) to Produce

Requested Income Tax Returns; and (2) to Categorize and Segregate Documents Produced in Response to First, Second, and Third Requests for Production of Documents on August 18, 2005 (the “Discovery Motions”).

2. According to Rule 7.1(B)(2), a party opposing a motion must file an opposition within fourteen (14) days after service. See L.R. 7.1(B)(2). Thus, Ms. Steffenberg’s Oppositions are due on or about September 1, 2005.

3. Scoll assents to this request for an extension of time to September 15, 2005 within which Ms. Steffenberg may file and serve her Oppositions to Mr. Scoll’s Discovery Motions.

WHEREFORE, Ms. Steffenberg moves for an extension of time to September 15, 2005 within which to respond to Mr. Scoll’s Discovery Motions.

Respectfully submitted,

ELIZABETH R. STEFFENBERG  
By her attorneys,

/s/ Christine S. Collins

Louis M. Ciavarra, Esquire (BBO #546481)  
Christine S. Collins, Esquire (BBO#639293)  
Bowditch & Dewey, LLP  
311 Main Street, P.O. Box 15156  
Worcester, MA 01615-0156  
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Assented to by:

DAVID M. SCOLL  
By his attorneys,

/s/ Sara Discepolo/CSC

George C. Rockas, Esquire (BBO #544009)  
Sara Discepolo, Esquire (BBO #628721)  
Wilson, Elser, Moskowitz, Edelman &  
Dicker LLP  
155 Federal Street  
Boston, MA 02110

Dated: August 30, 2005

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TRADETEK, LTD., and	)	
TRADETEK, LLC,	)	
	)	
Defendants.	)	

CERTIFICATE OF SERVICE

I, Christine S. Collins, hereby certify that I have this 30th day of August, 2005 served the foregoing by mailing a copy thereof, via first class mail, postage prepaid, to the following:

Rhonda L. Rittenberg, Esquire  
Prince, Lobel, Glovsky & Tye, LLP  
585 Commercial Street  
Boston, MA 02109-1024

Sara Discepolo, Esquire  
Wilson, Elser, Moskowitz, Edelman &  
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155 Federal Street  
Boston, MA 02110

/s/ Christine S. Collins  
Christine S. Collins